From: <u>Stephen Halasz</u>

To: Gary Moore/R6/USEPA/US@EPA

Subject: Fwd: RE: Clean Harbors contact information

Date: 03/13/2008 03:10 PM

Here's an email I received from them today.

Stephen Halasz Environmental Department Manager Kleinfelder 3601 Manor Road Austin, TX 78723 (o) 512.926.6650 (c) 512.796.9449



Do you really have to print this email? Think environment!

>>> "SPARACINO, MARK" <SPARACINO.MARK@cleanharbors.com> 3/12/2008 12:29 PM >>> Hello Steve.

Still working on best option for disposal of onsite waste. Leaning more for onsite treatment methods pending final lab bench studies. Should have something on paper for your cost analysis next week and schedule site visit very soon afterwards. Once again, look forward to meeting with Paul and reviewing tanks onsite.

Feel free to call me with questions/concerns/updates.

Take care, -mark

Mark Sparacino Key Account Manager Clean Harbors Environmental Services 13351 Scenic Highway

Baton Rouge, LA 70807 Office: 225.778.3585 Mobile: 225.268.2520 Fax: 225.778.3553

Email: sparacino.mark@cleanharbors.com

Web: www.cleanharbors.com

-----Original Message-----

From: Stephen Halasz [mailto:SHalasz@kleinfelder.com]

Sent: Monday, March 03, 2008 7:13 AM

To: SPARACINO, MARK

Subject: RE: Clean Harbors contact information

We classified the waste about four years ago when the tanks were full. What's left is anyone's guess. So I can't help you with coding, sorry.



Stephen Halasz Environmental Department Manager Kleinfelder 3601 Manor Road Austin, TX 78723 (o) 512.926.6650 (c) 512.796.9449

>>> "SPARACINO, MARK" <SPARACINO.MARK@cleanharbors.com> 3/2/2008 10:35 PM >>> Hello Steve,

Should we also assume the waste water will be NESHAP regulated with the advertised D018 RCRA code..?

Our "Waste Project" out of corporate is currently working options. Any other regulatory requirements or EPA codes along with available lab analysis results will help us too.

Again, thanks for your time and I'll follow up with phone call soon. Don't hesitate to call me if you have time.

-Mark

----Original Message-----

From: Stephen Halasz [mailto:SHalasz@kleinfelder.com]

Sent: Thursday, February 28, 2008 7:03 AM

To: SPARACINO, MARK

Subject: RE: Clean Harbors contact information

The samples were taken by opening a valve at the bottom of the respective tank. We have no idea how much there is. The tanks are in very poor condition and do not allow us to climb up and measure. In total it's reasonable to assume 1 million gallons.

In addition there is waste in tank 7, I'm not sure why Paul didn't send a sample. The material in tank 7 should be similar to tank 2.

There is no specific deadline other than sooner better than later.

The waste codes you mentioned have worked in the past.

Stephen Halasz Environmental Department Manager Kleinfelder 3601 Manor Road Austin, TX 78723 (o) 512.926.6650 (c) 512.796.9449 >>> "SPARACINO, MARK" <SPARACINO.MARK@cleanharbors.com> 2/27/2008 6:29 PM >>> Steve.

Not sure I have Paul's email address correct.

Anyhow, received five samples from Paul today. I'm schedule to discuss with corporate tomorrow and determine best options. Just from a quick review of samples today I know the following:

Five tanks that need Transportation and Disposal services or onsite treatment pending cost analysis.

No reported VOCs on any sample.

Tank- 2- pH8- oily sludge floating on top with clear liquids below. (10% sludge)

Tank-10-pH5- pretty clean and clear liquids (0-1% oily material)

Tank-21-pH6- oily/ water mixture throughout sample with 5% oily emulsion on top

Tank-26-pH6-oily sludge floating on top with clear liquids below. (5% sludge)

Tank-27-pH?- 100% sludge

Can you estimated volume in each tank..?

Can you state how samples were taken..? (ie. top of tank, dip tube, valve../etc)

Is there a current EPA deadline to remove the liquids offsite..?

Again, we'll assume samples are RCRA Haz with (D007,D008, D018) till we run analysis.

Thanks for the samples and look forward to our discussion with best options for removal of onsite waste.

Mark Sparacino Key Account Manager Clean Harbors Environmental Services 13351 Scenic Highway

Baton Rouge, LA 70807 Office: 225.778.3585 Mobile: 225.268.2520 Fax: 225.778.3553

Email: sparacino.mark@cleanharbors.com

Web: www.cleanharbors.com

-----Original Message-----

From: Stephen Halasz [mailto:SHalasz@kleinfelder.com]

Sent: Monday, February 25, 2008 1:28 PM

To: SPARACINO, MARK

Subject: RE: Clean Harbors contact information

Yes there's plenty of room

Stephen Halasz Environmental Department Manager Kleinfelder 3601 Manor Road Austin, TX 78723 (o) 512.926.6650 (c) 512.796.9449

>>> "SPARACINO, MARK" <SPARACINO.MARK@cleanharbors.com> 2/25/2008 1:23 PM >>>

Paul just called me and believes he can return samples this week for our bench studies.

Question: Could onsite treatment be an option..?

Mark Sparacino Key Account Manager Clean Harbors Environmental Services 13351 Scenic Highway

Baton Rouge, LA 70807 Office: 225.778.3585 Mobile: 225.268.2520 Fax: 225.778.3553

Email: sparacino.mark@cleanharbors.com

Web: www.cleanharbors.com

----Original Message-----

From: Stephen Halasz [mailto:SHalasz@kleinfelder.com]

Sent: Monday, February 25, 2008 1:21 PM

To: SPARACINO, MARK

Subject: RE: Clean Harbors contact information

I just talked to Paul, we look forward to hearing from you

Stephen Halasz Environmental Department Manager Kleinfelder 3601 Manor Road Austin, TX 78723 >>> "SPARACINO, MARK" <SPARACINO.MARK@cleanharbors.com> 2/25/2008 12:52 PM >>> Hello,

I sent sample jars and cooler via Fed-x last Friday and Paul should have them this morning. I'm not sure how fast Paul can sample tanks but would like to review prior to my flight into Corpus Christi next week. Let me know if you have additional information on waste stream or questions /concerns.

Right now I have ~ 800,000-1,000,000million gals of oily water with suspect RCRA codes (D007,D008, D018) that will require CERCLA approved disposal facility.

Thanks again for your time and future business.

Hope to meet you both soon-

Mark Sparacino Key Account Manager Clean Harbors Environmental Services 13351 Scenic Highway

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Email: sparacino.mark@cleanharbors.com

Web: www.cleanharbors.com

----Original Message-----

From: Stephen Halasz [mailto:SHalasz@kleinfelder.com]

Sent: Tuesday, February 19, 2008 1:53 PM

To: SPARACINO, MARK

Subject: RE: Clean Harbors contact information

The refinery is abandoned so there is no mail delivery to the site. An oil and gas operator leases some of the tanks and collects oil from wells and then barges to whichever refinery is paying the highest rate. But still there are no regular on site personnel.

When we're actively doing sampling my on site manager is Paul Supak who works in our Corpus office. The address is 5002 Ambassador Row, Corpus Christi, Texas,

78469. The phone is 361.854.4774.

You're probably better of visiting with Paul at the site rather than with me. That way you can get a lay of the land. Paul fills 9 tankers full of waste on Thursdays (three trucks with three trips), that may be the best day to schedule a trip. The refinery is located in Ingleside.

Stephen Halasz Environmental Department Manager Kleinfelder 3601 Manor Road Austin, TX 78723 (o) 512.926.6650 (c) 512.796.9449

>>> "SPARACINO, MARK" <SPARACINO.MARK@cleanharbors.com> 2/19/2008 1:41 PM >>> Great...thanks for the update.

Do you have any current composition in regards to the two waste streams.?

(RCRA codes / MSDS sheets / composition percentages versus water)

This is important for proper handling of samples and will help us determine best disposal outlet.

Can you provide shipping address to site?
I'll work on shipping sample jars / cooler. Working on flight arrangements now and will let you know my schedule ASAP.

Myself and corporate account manager responsible for Kleinfelder nation wide would like to stop by in couple weeks for introduction pending your schedule. How does that sound.?

Mark Sparacino Key Account Manager Clean Harbors Environmental Services 13351 Scenic Highway Baton Rouge, LA 70807

Office: 225.778.3585 Mobile: 225.268.2520 Fax: 225.778.3553 Email: sparacino.mark@cleanharbors.com

Web: www.cleanharbors.com

-----Original Message-----

From: Stephen Halasz [mailto:SHalasz@kleinfelder.com]

Sent: Tuesday, February 19, 2008 1:16 PM

To: SPARACINO, MARK

Subject: Re: Clean Harbors contact information

All together there is approximately 1 million gallons, that includes caustic waste and oily waste.

I'm sure he could send along samples, you'll need to supply the containers, let him know the volume required and if possible provide a cooler.

We can wait a few weeks, are you ever in the area to look first hand?

Stephen Halasz Environmental Department Manager Kleinfelder 3601 Manor Road Austin, TX 78723 (o) 512.926.6650 (c) 512.796.9449

>>> "SPARACINO, MARK" <SPARACINO.MARK@cleanharbors.com> 2/19/2008 11:38 AM >>> Steve,

Thanks for the time you extended to me today and I look forward to working with Kleinfelder. Moreover, I'm excited about finding an outlet for Falcon Refinery opportunities you mentioned and any other environmental issues Clean Harbors can acquire services.

To recap our phone conversation today:

Current need for removal of >1,000,000 gals of dirty oily water not suited for recovery or deepwell and requires an CERCLA approved disposal facility. Falcon Refinery is located near a barge terminal with direct pipeline loading capabilities. Kleinfelder can coordinate barge to ship waste stream to approved facility. In addition, this site has ~200,000gals of unknown composition with pH > 14.

Also, you mentioned I could meet your onsite coordinator at Corpus Christi, TX with the possibility of obtaining composite samples of above mentioned waste streams. Does your site coordinator have the time to ship samples to our Baton Rouge, LA waste water facility (address below) for bench studies.?

Clean Harbors (Baton Rouge) 13351 Scenic Highway Baton Rouge, LA 70807 ATTN: Mark Sparacino 225-778-3585

Just wanted to pass along my information and inform your office that Kleinfelder has been setup as an Clean Harbors corporate account. Please don't hesitate to call me with more information or questions/concerns about Clean Harbors services. I encourage you to visit our web site (link below). Moreover, I attached below a copy of our services, remediation fact sheet and company brochure.

Best Regards-

Mark Sparacino
Key Account Manager
Clean Harbors Environmental Services
13351 Scenic Highway
Baton Rouge, LA 70807

Office: 225.778.3585

Mobile: 225.268.2520

Fax: 225.778.3553

Email: sparacino.mark@cleanharbors.com

Web: www.cleanharbors.com

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